

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

MDD003093598

AMOCO DIL CO BALT REFINERY SHIELDS ROBERT MANAGER 3901 ASIATIC AVE BALTIMORE

MD 21226

JAN 10 1984

Dear Owner/Operator:

On November 23, 1983, EPA granted Phase II, Component A Interim Authorization to the State of Maryland to operate its hazardous waste program in lieu of the Federal program. Phase II, Component A consists of the regulations for permitting the storage and treatment of hazardous wastes in tanks, containers, surface impoundments and waste piles.

From the information which you have submitted to EPA to date, it appears that part or all of your facility will now be permitted only by the State of Maryland. If you <u>dispose</u> of hazardous wastes on land, including surface impoundments, or you incinerate hazardous wastes, you will need a RCRA permit from EPA for those portions of your operation. Where possible, EPA and the State will coordinate their respective permitting programs to enable you to prepare one application covering your entire facility.

Mr. Ronald Nelson is the Director of the Maryland Waste Management Administration of the Department of Health and Mental Hygiene. If you have any questions regarding Maryland's hazardous waste program, Mr. Nelson can be reached at (301) 383-3123.

If you have any questions about this letter or the EPA program, please do not hesitate to contact Mr. John Humphries of my staff, who serves as the Maryland Program Manager. He can be reached at the above address or by calling 215/597-2863.

Sincerely,

Róbert L. Allen, Chief Waste Management Branch

Air & Waste Management Division

cc: Mr. Ronald Nelson



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

Mr. Robert Shields Amoco Oil Co. Balt Refinery 3901 Asiatic Avenue Baltimore, MD 21226

Dear Mr. Shields:

Section 3019 of the Hazardous and Solid Waste Amendments of 1984 establishes a new program for the collection, reporting, and analysis of information on the potential human exposure from releases of contaminants from hazardous waste landfills and surface impoundments. Attached is the Permit Applicants' Guidance Manual for Exposure Information Requirements Under RCRA Section 3019. This manual provides the items that must be addressed in the Exposure Information Report (EIR) by the applicant.

As can be seen from the attached, facilities that have submitted Part B applications for landfills and surface impoundments are required, by statute, to submit the EIR by August 8, 1985. If the Part B application hasn't been submitted, the EIR must be submitted at the time of application.

Any questions regarding the specific information that must be submitted should be directed to Samuel Rotenberg (see Appendix B). The EIR should be sent to me and a copy to the appropriate State agency (see Appendix C).

EPA is aware of the short time frames and if there is anything that we can do to help, please feel free to call 597-3658.

Sincerely yours

Henry Sokolowski

Chief, MD/DE/DC Section

cc: Samuel Rotenberg

UNITED STATES ENVIRONMENTAL PHOTECTION AGENCY

Region III - 6th & Walnut Sts. Philadelphia, Pa. 19106

Amoco Oil Co. MDD 003 093 598

UBJECT: RCRA Inspection-

DATE: July 20, 1982

ROM Superfund/RCRA Compliance Section (3AW23)

0: File

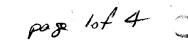
> Walter F. Lee, Chief Thru:

Superfund/RCRA Compliance Section (3AW23)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY

REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS

REQUIRED AT THIS TIME.





State of Maryland Department of Health and Mental Hygiene Office of Environmental Programs 201 W. Preston St., Balto. MD 21201

YR MO DY 8 | Z 0 | G | 1 | 6

DHS Inspection Form Generators/TSD Facilities

0 19 3 D

Gonorator	5/102 · 40/////00	
EPA ID Number	· <u></u>	TELEPHONE
MDD003093598	301	356-5325
Owner/Operator Amoco O.1 Company		
		Zip 21 226
Description of Work Activity Refinery Shut de	oum - cloon up work	k in progress
I. Generators A. Description (10.51.03.01.44) 1) Does the Facility generate or has it accumulated the quantities of hazardous waste described in 10.51.02.05 (2) Has the facility obtained an EPA identification number Yes,No.	2) Does facility generate D 3) Does facility have waste If yes, are the procedu Yes, No. 4) Can facility personne Yes, No. 5) Can facility personne	HS? Yes, No. analysis plan? Yes, No. Ires of that plan being followed? I identify DHS being handled?
Describe the amount of waste generated. (day, week or mon Under which category is the waste(s)? Ignitable Reactive Corrosive RCRA Listed	6) Is there a 24-Hour surveil tion of facility? Ye If No, is there an artifici	llance system to monitor active por- s,No. al or natural boundary?Yes, eans to control entry?Yes,
B. Manifest (10.51.03.04) 1) Is Maryland manifest system in operation for off-site sh ment? Yes, No. 2) Is TSD Facility to receive DHS identified by Nan Address, EPA ID Number? 3) Is alternate facility identified? Yes, No.	Yes, No. Yes, No. Does facility have: Yes, No. Yes,	restricted access sign posted? Lemergency equipment inspection lule for inspections,security uctural prevention equipment? completed classroom(on-site train-
4) Is generator identified byName,AddresTelephone Number,MD/FPA ID Number? 5) Is each transporter identified byName,EPA Number,Maryland Certification Number? 6) Is waste property described?Yes,No. 7) Is shipment date marked?Yes,No. 8) Is quantity of waste described byUnit of Weig	employees job de continuing training? F 9) Are general requirement patible Wastes as requ	d of:Job_titles/names of escriptions,Type/amount of is for ignitable, Reactive or Incomired in 10.51.05.02 H addressed?
Volume? 9) Are containers to be loaded identified byTyp	or? munication/alarm system vice for summoning emergine control equipment,list of aforementic 2) Does facility have adequergy Yes,No.	ntion (10.51.05.03) In equipment? Internal common for on-site personnel dergency assistance, adequate water, & suppression chemicals, oned equipment. ate area for emergency movement?
ls each container marked with date accumulation begatives,No. If yes, has any waste been stored over 90 days?Yes,No. How much 2) Are containers in good condition?Yes,No. If no, explainNo.	Ver C. Contingency Plan and En 1) Does facility have an Personnel to imp file, explosions, and ur water?	approved contingency plan for: lement emergency procedures to applanned releases to air, soil and
Are containers properly labeled?Yes,No. Does generator have approved emergency contingen plan?Yes,No.	duffing emergency situat	gency units to provide assistance ions? cy equipment needed to cope with
 D. Recordkeeping and Reporting (10.51.03.06) 1) Does the generator have: copies of all signed manifes from the previous three years?Yes,No; copies of each Annual Report and Exception Report Yes,No. 2) Does the generator retain, for a period of three years, 	2) Are emergency respons dress, & phone number? 3) Is there an evacuation No. 4) Are emergency coordinates	plan if recommended?Yes, ators available on twenty-four hour
wastes analyses?No. 3) Has the generator filed Exception Reports as required 10.51.03.06 C?Yes,No.	by D. Manifest System, Recording Facility has a written op	reeping, and Reporting (10.51.05.05) erating record which contains the
II. Treatment, Storage, Disposal (TSD) A. Site characterization (10.51.05.02) 1) Facility Type Thermal Treatment Recycling/Recovery Waste Oil Chemical Treatment Physical Treatment Open Pile Surface Impoundment II. Biological Treatment Land Treatment Landfill Operation Below Ground Tanks Other	3) NO location & quantit 4) VCS detailed records & ability tests performed. 5) NO detailed operating of description of emplementation of conting records & results of ment, TSD systems & ha	JHS treatment, storage, or disposal, y at each DHS location in facility. A results of waste analysis & treatsummary reports. Bright Streat imperior in the streat imperior incidents that required imperior plan. The streat imperior inspections of emergency equipolar inspections are as.
Drums Above Ground Tank(s)	8) Has facility retained, for fests?Yes,	at least 3 years, copies of all mani- No. Sea I.D.I. Regue K.

E. Groundwater Monitoring (10.51.05.06)
1) Has facility implemented a groundwater monitoring program? _____Yes, _____No, _____N/A.
2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? _____Yes, _____No.
3) Is this plan set up in accordance with 10.51.05.06 C? _____Yes, _____No.
4) Has groundwater quality assessment program been prepared? _____Yes, _____No.
5) Are proper groundwater sampling and analyses records kept? ______Yes, _____No.
6) Are the necessary reports on groundwater monitoring inforb) is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? _____Yes, ____No.

c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NEPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code" 1977"? _____Yes, ____No. Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? ____Yes, _____Yo. 7) Do the reports match the facility records? No. G. Container Management (10.51.05.09)

Are all containers: (a) in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b) lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c) sealed during storage.

2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? _____Yes, _____No. waste under Parts 261.21 or 261.23 of the RCRA Regulations? ____Yes, ____No.

b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? ____Yes, ____No. Nó. 3) Is an inspection log maintained? _____Yes, ____No.
 4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? ____Yes, J. Waste Pile (10.51.05.12) 1) Is wind dispersal of the pile controlled? ____Yes, ___No, ___Not Needed.
2) Are additions to the pile being analyzed prior to adding them to the pile? ____Yes, ____ No. 5) Are incompatible wastes placed in separate containers? Yes, ____No.

6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? ____Yes, ____No. them to the pile? ____Yes, ____No. Is the pile protected from precipitation and runon? _____No. Are ignitible or reactive wastes protected from materials or H. Tanks (10.51.05.10)

A place of the response of the property of the tanks in good condition, i.e., no signs of the pakage, corrosion, or any other deterioration: ______Yes, _____No.

2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? ______Yes, _____No.

If path is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? _____Yes, No. 5) Are incompatible wastes hauled in a manner as to assure separation? _____Yes, ____No, ____N/A. __Yes, _ K. Land Treatment (10.51.05.13)
Will the use of land treatment result in the waste being Jess hazardous or non-hazardous? _____Yes, ____No. _No. Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? Yes, No. Are waste analyses conducted or written documentation No.

If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? ____Yes, ____No.

Has the owner/operator written and implemented an unsaturated zone menitoring plan? _____Yes, ____No.

Have the additional requirements for a closure and post-closure plan been addressed? _____Yes, ____No.

Are ignitable or reactive wastes immediately incorporated into the soil? _____Yes, _____No.

Are incompatible wastes bauled according to 10 51 05 1312 obtained before placing a substantially different hazardous waste into tank used for storage or treatment? Yes, Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? Yes, No.

6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day?

Yes, No. yes, ____No.

7) Is the level of waste in the tank checked at least once each operating day? ____Yes, ____No.

8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? ____Yes, ____No.

9) Are the results of these inspections recorded in an inspection log or summary? ____Yes _____No.

10) Are ignitable or reactive wastes stored in tanks? ______Yes, _____No. If yes: Are used.

a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer Are incompatible wastes hauled according to 10.51.05.13 I? Yes, _ L. Landfills (10.51.05.14) 1) Is run-spudiverted away from the facility's active portions? 2) Is run-off collected from the landfill's active portions? _Yes, No.

ing waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations?

No.

Yes,

Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste)

4) Is the landfill managed so as to control wind dispersal?

No.

Yes.

5) Are the following items maintained in the operating records on a map, the exact location and dimensions including depth, of each cell with respect to permanently surveyed benchmarks?contents of each cell and approximate location of each hazardous waste type within the cell?	3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? Yes, No. 4) Is this information recorded in the facility's operating record? Yes, No.
6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? Yes, No. If yes: is a leachate collection system available to remove leachate?, and is the liquid stabilized or treated physically or chemically prior to disposal? 7) Are empty containers crushed flat or shredded before burial in the landfill? Yes, No. 8) Are containers holding liquid wastes (or waste containing	 5) Are daily inspections conducted for dispharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? Yes, No. 6) Is data gathered from monitoring equipment (e.g., pressure and temperature galges) daily? Yes, No. 7) Are construction materials of the treatment process or
free liquids placed in the landfill? Yes,No. If yes, describe containers on comments below. 9) Are ignitable or reactive wastes placed in a landfill?	equipment and the impediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration?Yes,No. 8) Are the results of these inspections recorded in an inspec-
Yes,No. If yes:Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste?Are incompatible wastes segregated in different landfill cells?	tion log or summary?
M. Incinerator/Thermal Treatment (10.51.05.15 & .16) 1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:	or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations? Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react? 10) Are incompatible wastes kept from being placed in the same treatment process or equipment? Yes,
mented data is available which show these elements not to be present? 2) Are instruments related to combustion and emission control monitored at least every 15 minutes?Yes,	O. Permit Requirements (10.51.07)
No. Is the stack plume observed visually at least hourly for color and opacity? Yes, No, N/A. 4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emis-	Does the facility have a DHS permit for its activity? Yes, No. If no, has the facility submitted an application for a DHS permit? Yes, No. 2) List any special Permit requirements that are not in full
sions? Yes, No. 5) Is all of the above information documented in the facility's operating record? Yes, No.	compliance. A 248
N. Chemical, Physical and Biological Treatment (10.51.05.17) 1) Are all treatment processes or equipment in good condition, i.e. no signs of leakage, corrosion or any other deterioration?Yes,No. 2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a treatment of the contraction of the contraction of the contraction.	
a standby containment device)Yes,No. Comments:See Steet 4544	
Comments:	
	•
Inspector's Name: Charle B Law 111	Tille Have been Whele I amade
Facility Location: Amoco 0,1 Refidery - Curti	Title: Hozar dons Washe In goed for
$\sim 1 + 100$	1 = Cot and T
Facility Rep. present during inspection:	Title: July Engle Ma/N/



State of Maryland Department of Health and Mental Hygiene Office of Environmental Programs 201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations:	Date <u> </u>
Type of Inspection/Observations: Parks finding Change (Tarmeral)	
Remarks:	
Belivery not now in production	
Relivery not now in production Penedo below reflect inspection form out	- India
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No accords of waste analysis from 1978 issee	une do t
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어른 사람들이 살아왔다. 그는	
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information as to action taken and it	Cause of
inspection log.	No record in
inspection log.	
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F. Grandwoler Monistering - plan for grandwot	1 Promoto
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referre to letter of Jone 7, 1982 from 1	moss, Mr.
Church agreeded to collect date from dail	3. mgs ing
rates, volumes for well No. 3.13, -d?	3826
and Bong without over the most worth.	The met for 1
and Bone with over the west worth.	
J	
DHMH 3879	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS - PHILADELPHIA, PENNSYLVANIA 19106

JUL 13 1981

Mr. J. F. Forner Amoco Oil Company 3901 Asiatic Avenue Baltimore, MD 21226

Dear Mr. Forner:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Chief, RCRA, Administrative Support Section

Permits Enforcement Branch

-Enclosure

CONDITIONS OF OPERATION DURING INTERIM STATUS

Date Prepared: July 13, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

Facility name, location, and EPA Identification Number.

Name: Amoco Oil Company

Location: 3901 Asiatic Avenue Baltimore, MD 21226

EPA I.D. No.: MDD_ 00 309 3598

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. J. F. Forner Refining & Engineering

Operator's Name:

III. During the period of interim status, the facility may use <u>only</u> the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

0.000.0-1-
2,000 Gals.
30,000 Gals.Per Day
20,000 Gals.

IV. During the period of interim status, the facility may handle <u>only</u> the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

_F001	_F002_	F003_	<u>K049</u>	K050_
	•		•	
K051	_D001	D003		